

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11 Case
)	
Old LC, Inc., <i>et al.</i> ¹)	Case No. 19-11791 (BLS)
)	
Debtors.)	Jointly Administered

Official Committee of Unsecured Creditors
of Old LC, Inc., et al., for and on behalf of
the estates of Old LC, Inc., et al.;

Plaintiff,

v.

Upfront V, LP, Breakwater Credit
Opportunities Fund, L.P. Upfront GP V,
LLC; Mark Suster; Dana Kibler; Gregory
Bettinelli; Saif Mansour; Aamir Amdani;
Eric Beckman; Darrick Geant; and Joseph
Kaczorowski

Defendants.

Adv. No. 20-51002 (BLS)

**NOTICE OF DEPOSITION OF ALEXANDRE ZYNGIER
PURSUANT TO FED. R. CIV. PROC. 30**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30, made applicable herein by Federal Rules of Bankruptcy Procedure 7030 and 9014, Upfront V, LP, Upfront GP V, LLC, Mark Suster, Dana Kibler, and Gregory Bettinelli (collectively, the “Upfront Defendants”) in the above-captioned adversary proceeding, will take the deposition upon oral examination of Alexandre Zyngier.

¹ The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors’ noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14th Floor, Atlanta, Georgia 30309.

The deposition will take place on May 31, 2022, at 9:00 a.m. (Eastern Time) or at such other date and time as the parties may agree. The deposition will be conducted remotely.

With respect to the conduct of this remote deposition:

1. Counsel for the parties and their clients will be participating from various, separate locations;
2. The court reporter will administer the oath to the witness remotely;
3. Each participating attorney must be visible to all other participants, and their statements will be audible to all participants;
4. All exhibits will be provided simultaneously and electronically to the witness and all participants;
5. The court reporter will record the testimony;
6. The deposition may be videotaped; and
7. The deposition may be recorded electronically through the use of Realtime or a similar application.

Dated: May 26, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Dean Ziehl (CA Bar No. 84529)
Colin R. Robinson (DE Bar No. 5524)
Cia H. Mackle (FL Bar No. 0026471)
919 North Market Street, 17th Floor
P.O. Box. 8705
Wilmington, Delaware 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
E-mail: dziehl@pszjlaw.com
crobinson@pszjlaw.com
cmackle@pszjlaw.com

Counsel to the Upfront Defendants